

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

**KRISTINA RAPUANO *et al.*, on behalf of
themselves and all others similarly situated,**

Plaintiffs,

v.

TRUSTEES OF DARTMOUTH COLLEGE,

Defendants.

HON. LANDYA B. MCCAFFERTY, U.S.D.J.

CASE NO. 1:18-cv-01070 (LM)

**PLAINTIFF JANE DOE 2 AND JANE DOE 3’S
MOTION FOR LEAVE TO EXCEED PAGE LIMITATION**

Plaintiffs Jane Doe 2 (“JD2”) and Jane Doe 3 (“JD3”) (collectively, “Moving Jane Doe Plaintiffs”) respectfully request that the Court enter an Order extending the page limitation established by Local Rule 7.1(e)(2) for their upcoming Memorandum in Reply to Defendant’s Consolidated Opposition to Plaintiff Jane Doe 2’s Motion to Proceed Under Pseudonym and Plaintiff Jane Doe 3’s Motion to Proceed Under Pseudonym (Dkt. 34) (“Consolidated Opposition”) to 10 pages containing double-spaced Times New Roman 12-point font.

Defendant’s Consolidated Opposition responds to two separate Motions filed by Plaintiffs (Dkts. 29 and 30) and seeks to prevent two Plaintiffs, Jane Doe 2 and Jane Doe 3, from proceeding under pseudonym. Moreover, in its Consolidated Opposition, Defendant both opposes the legal arguments set forth in JD2 and JD3’s moving papers and advances new legal theories in support of its position. Accordingly, the Moving Jane Doe Plaintiffs respectfully request these additional pages of briefing to fully brief the Court on the relevant facts and issues.¹

¹ A separate memorandum of law is unnecessary because the authority for the relief sought is set forth herein.

Pursuant to Local Rule 7.1(c), the undersigned hereby certifies that counsel conferred with Defendant prior to filing this Motion in a good faith effort to obtain Defendant's concurrence. Defendant's counsel indicated that Defendant takes no position on this Motion and it may file a brief response.

WHEREFORE, Plaintiffs Jane Doe 2 and Jane Doe 3 request that this Court enter the proposed Order filed concurrently herewith to extend the page limit as set forth above.

Dated: May 20, 2019

Respectfully submitted,

/s/ Deborah K. Marcuse

Deborah K. Marcuse (admitted *pro hac vice*)

Steven J. Kelley (admitted *pro hac vice*)

Austin L. Webbert (admitted *pro hac vice*)

SANFORD HEISLER SHARP, LLP

111 S. Calvert Street, Suite 1950

Baltimore, MD 21202

Telephone: (410) 834-7415

Facsimile: (410) 834-7425

dmarcuse@sanfordheisler.com

skelly@sanfordheisler.com

awebbert@sanfordheisler.com

David W. Sanford (admitted *pro hac vice*)

Nicole E. Wiitala (admitted *pro hac vice*)

SANFORD HEISLER SHARP, LLP

1350 Avenue of the Americas, 31st Floor

New York, New York 10019

Telephone: (646) 402-5650

Facsimile: (646) 402-5651

dsanford@sanfordheisler.com

nwiitala@sanfordheisler.com

-- and --

Charles G. Douglas, III (NH Bar #669)

DOUGLAS, LEONARD & GARVEY, P.C.

14 South Street, Suite 5

Concord, NH 03301

Telephone: (603) 224-1988

Fax: (603) 229-1988
chuck@nhlawoffice.com

Attorneys for Plaintiffs and the Proposed Class